

POLICIES

GRANT PAYMENTS

Checks will be issued on a quarterly advance basis, contingent upon compliance with reporting requirements. Grantees should receive checks within 14-21 days after the due date of the Financial Status Report. If the Grantee has a **change of address**, the Attorney General's Office must be notified in writing on grantee letterhead of the new address prior to the change.

If for any reason a grantee requires a shorter turn-around time or an advance, a need of emergency funds can be requested. To make this request, a letter must be faxed to the Attorney General's Office at (785) 296-7796, at which time the following criteria will be considered by staff:

1. The number of times in which a request for emergency funds has been made previously.
2. The timeliness and correctness of all grant reports (both Financial Status Reports and any Grant Project Statistical Report).
3. The need for the grantee to receive funds immediately.
4. The grantee's reserve amount and why the reserve cannot be used temporarily.
5. What efforts the grantee is making to build up a sufficient reserve.

It is the grantee's responsibility to address numbers 3, 4, and 5 in the request. The grantee will be notified by phone with the Attorney General's decision.

REPORTING REQUIREMENTS

The following policy is to be applied to any grant reporting requirement set forth by this office. However, each grant program administered by this office has its own unique reporting requirements, so please refer to each individual report to find the appropriate due dates and instructions.

All reports received by this office that are **complete and correct** on the date that they are due will be issued a check, as long as funds are available from the appropriate state sources and as long as the subgrantee is in compliance with all grant awards received from this office. This also includes any requirements made during a grant review. **Any grantee submitting a late, incorrect, or incomplete report will not receive a check until the next batch of checks are issued for that particular grant program.** Complete and correct reports must be received by 5:00 p.m. on the date that it is due. If this date falls on a Saturday, Sunday, or State Holiday, it may be submitted by 5:00 p.m. the next working day following that due date.

In any reporting period in which no expenses were incurred or no activity took place, the required reports must still be filed in a timely manner with the Attorney General's Office. If no expenses were incurred, report a zero for the period in question. If no activity took place or no services were provided, report zero statistics or state why no activity took place for the period in question.

If the grantee incurs obligations during the final grant reporting period that will be paid in the first month following the end of the grant period, the grantee may mark the Financial Status Report as "NOT THE FINAL" report, reflecting those obligations appropriately. Upon expenditure for those obligations, the grantee will submit a "FINAL" Financial Status Report reflecting them as "Period Expenditures" in the first month following the end of the grant project period.

A grantee may fax its grant reports in order to comply with meeting the reporting deadline. **The fax number is (785) 296-7796. Please limit faxes to 10 pages.** The faxed report must have all the required signatures and be received by 5:00 p.m. on or before the date it is due. This office will **not** consider a faxed copy of a report to be timely if it is incomplete, lacking one or more signatures, or incorrect. Checks will not be issued for those not complying with this policy of faxing reports. **If a grantee chooses to fax a report, please do not follow it with a mailed copy.** The only documentation that must be mailed with original signatures is the Grant Assurances Form.

A grantee may **request in writing** an extension to submit a report late. Only under extreme circumstances will exemptions be allowed, i.e. medical emergencies, etc. If a letter is received before or on the due date of the report, a check may still be issued. The check will then be mailed upon submission of the report. A staff member of the Attorney General's Office will contact the grantee by phone to discuss the time line for the extended report and grant payment.

BUDGET REVISIONS

Any modification, to the grantee's budget upon grant award notification exceeding **10%**, as described below, must first be approved by the Attorney General's Office. The procedure for receiving a budget revision follows.

Requirements:

Revision Request –Reallocation of dollars between approved line items in the subgrantee's grant project budget upon grant award notification is allowed one time without prior approval up to **10%** of the total line item cost that the funds are taken from, provided the change does not affect the scope of the grant project. However, a revised **Budget Summary Form and Budget Narrative** must be submitted to the Attorney General's Office 10 days prior to the effective date of the change. This rule does not apply to line items in the Equipment budget category.

Any modification made to the subgrantee's grant project budget upon grant award notification that exceeds the **10%** rule or is a modification in the Equipment budget category must first be approved by the Attorney General's Office. The Attorney General's Office defines equipment as assets with a useful life of one year or more and a purchase cost of \$100 or more. A written request should include an explanation of the need for the revision and the amount of grant funds that will be reappropriated. Budget revisions may only be requested within line items previously approved; funds cannot be moved into a new line item during the grant project period except under extreme circumstances. Please remember grant project funds cannot be used to reimburse mileage expenses in excess of \$.40 per mile. If the grantee chooses to reimburse at a rate in excess of this amount, the grantee should be aware that no grant funds administered by the Kansas Attorney General's Office can be used to make up the difference. Grant project funds cannot be used to attend conferences/meetings/etc. that occur outside the United States.

Budget Summary Form – Attach to the budget revision request a revised Budget Summary Form (attached) reflecting the new requested budget. This form must be filled out completely and signed by a grantee Representative for the request to be considered.

Budget Narrative - Attach to the budget revision request a revised Budget Narrative reflecting the new requested budget.

Approval/Denial – The Attorney General's Office will respond in writing within 30 days to the grantee's request. A request for a budget revision may be approved as requested, it may be partially approved, or it may be denied.

There is no limit to the number of budget revisions a grantee can request. However, frequent or repeated requests may raise concerns in regard to the grantee's budgeting practices. **No budget revisions may be requested during the final 30 days of the grant project period.**

An approval to allow a budget revision is effective as of the date of the approval letter. If the grantee requires the budget revision to be retroactive, or effective on a prior date, then the grantee must make that need clear in the original revision request.

EQUIPMENT PURCHASES

All equipment purchased with grant funds must have been included in the grantee's approved budget prior to the purchase. The Attorney General's Office defines equipment as assets with a useful life of one year or more and a purchase cost of \$100 or more. The grantee shall follow its agency written policies and procedures in regard to purchasing approval, needs assessment, bidding, etc. when purchasing equipment. For each equipment purchase, the grantee must provide the Attorney General's Office by mail or by fax, (785) 291-3875, with the following information within 30 days of the purchase date.

- Description of the Equipment
- Serial Number or other Identification Number
- Source of the Equipment
- Identification of Who Holds the Title
- Acquisition Date
- Cost of the Equipment
- Cost charged to Grant
- Percentage of Grant Fund Participation in the Cost of the Equipment
- Location of the Equipment
- Use and Condition of the Equipment

An Equipment Inventory Form is attached that includes all of the information listed above. It is the grantee's responsibility to maintain inventory records that can be reviewed at any time by the Attorney General's staff. In addition, the grantee is responsible for providing justification as to the need and use of the equipment. The amount of time the equipment is used for the grant project must be equal to or more than the percentage of the purchase cost that was covered by grant funds. In some instances, this may lead to the need for a usage tracking system to be in place, however, that is at the grantee's discretion if using such a system is necessary to provide adequate documentation.

AUDIT REQUIREMENT

The Attorney General's Office requires an audit to be conducted on any organization receiving grant funds. At a minimum, a financial statement audit must be provided over the most recent completed fiscal period following the requirements prescribed in OMB (Office of Management and Budget) Circular A-133.

There are three types of services that an independent accountant may perform for an organization: a compilation, a review, and an audit. A compilation is simply the preparation of financial statements, but they are unaudited, unreviewed, and provide no assurances. A review requires some analytical procedures to be performed, but offers a limited assurance. An audit includes the performance of analytical procedures, evaluation of evidence, and provides positive assurance regarding the financial statements presented.

This office does not accept compilations or reviews as substitution for an audit report. For organizations expending \$300,000 or more in federal funds during their fiscal year, a Single Audit is also required as stipulated in OMB Circular A-133. grantees that do not provide sufficient information regarding their audit with their grant application will receive Special Conditions attached to their grant award in order to comply with these requirements.

CLOSEOUT FOR PFA GRANTS

During closeout, the Attorney General's staff evaluates all grant required work done by the grantee. When all work is complete and all necessary follow-up action is taken, the grant file is closed.

Requirements:

Financial Status Report--This report is to be completed quarterly, with the final Financial Status Report due in the Attorney General's Office **by 5:00 p.m., July 25, 2007**. Staff ensures that the reports were timely, that grant funds were expended in accordance with the Approved Budget, and that any excess grant funds on hand were returned to the Attorney General's Office.

Grant Project Statistical Report--This report is to be completed quarterly, with the final Grant Project Statistical Report due in the Attorney General's Office **by 5:00 p.m., July 25, 2007**. Staff ensures that the reports were timely, that the grantee conducted its grant project in accordance with approved goals and objectives, and that the grantee completed the reports in accordance with the instructions provided by the Attorney General's Office.

Grant Project Performance Report--This report is due July **25, 2007**.

Equipment Inventory Form--This form is to be completed and sent to the Attorney General's Office within 30 days of purchasing equipment with grant funds. Staff ensures that for every expenditure made in the equipment budget line item, there is inventory information on file.

Grant Review--The grantee may receive a grant review for each grant award made. The grant review may be a desk review or an on-site review. Any issues raised during the grant review must be resolved before the grant file can be closed.

When there are problems preventing the closeout of a grant, the grantee will be notified in writing and requested to take corrective action. After all of the criteria have been satisfied, the grant file will be closed and a closeout letter will be sent to the grantee.

REPORTING FORMS